

EXHIBIT F

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By Email and First Class Mail
April 16, 2018

Sean P. Carter, Esquire
Scott Tarbutton, Esquire
Cozen O'Connor, P.C.
1650 Market Place
Philadelphia, PA 19103-7301

Re: In re Terrorist Attacks, No. 03-MDL-1570

Dear Counsel:

I write on behalf of defendant Mr. Soliman H.S. Al-Buthe, in response to the queries that plaintiffs' counsel raised during the discovery conference call on April 11, 2018.

If his deposition were to go forward, Mr. Al-Buthe would have to be deposed by videoconferencing from Saudi Arabia as he cannot travel outside that country, and he would require an Arabic translator. We can work with you to identify a suitable office location in Saudi Arabia for the videoconferencing, which will save the plaintiffs the substantial travel expenses of taking depositions in Western Europe.

However, as you know, Mr. Al-Buthe remains named as a defendant in the indictment that is pending in the U.S. District Court for the District of Oregon. While the government agreed to dismiss both the Al Haramain Islamic Foundation, Inc. (USA) and Perouz Sedaghaty – the latter after the U.S. Court of Appeals reversed and remanded the decision as to Mr. Sedaghaty – Mr. Al-Buthe is still listed as a defendant. If he were to be deposed in the civil case, he would have to assert the Fifth Amendment privilege against self-incrimination. We are trying to remove that impediment through taking all efforts possible to get the criminal case dismissed, but that has not yet happened.

Further, given that there are no other “Al Haramain defendants” remaining in this case, it is not clear to me that plaintiffs will have any broader use for Mr. Al-Buthe’s testimony. He would not have relevant information (that plaintiffs do not already know) regarding the other defendants who do remain in this case. Could you let us know what information you think Mr. Al-Buthe has that would be of use in these actions?

Sean P. Carter, Esquire
Scott Tarbutton, Esquire
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Page 2 of 2

We look forward to your response.

Sincerely,

/s/ Alan

Alan R. Kabat

cc: MDL 1570 counsel